

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

vs.

STARSKY D. BOMER

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Case No. 4:16cr257-2

DEFENDANT BOMER’S UNOPPOSED MOTION TO MODIFY BOND

Comes now, Defendant STARSKY D. BOMER, through undersigned counsel, and files this Motion to Modify Bond, and in support thereof would show the Court the following:

1. Defendant Starsky D. Bomer (“Defendant Bomer”) is charged in a 5 count indictment with conspiracy to pay and receive health care kickbacks and violation of the anti-kickback statute
2. On June 24, 2016, Defendant Bomer was released pending trial on a \$100,000 secured bond. As part of his release, an Order Setting Conditions of Release was entered requiring electronic monitoring and a curfew as directed by the Pretrial Services Office.
3. Defendant Bomer has faithfully abided by all conditions of his bond.
4. In light of his electronic monitoring, Defendant Bomer requests that the curfew restriction be removed from his conditions of release.
5. On December 12, 2016, undersigned counsel conferred with Assistant United States Attorney Jonathan Baum, who stated he is unopposed to the granting of this motion. Additionally, on December 12, 2016, undersigned counsel conferred with United States Pretrial Services Officer Virginia Finley, who stated she is unopposed to the granting of this motion.

WHEREFORE, Defendant Bomer moves that the curfew restriction be removed from the conditions of release of his bond.

Respectfully submitted,

/s/ Richard Kuniansky
RICHARD KUNIANSKY
State Bar No. 11762840
440 Louisiana, Suite 200
Houston, Texas 77002
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Facsimile: (713) 224-2815

CERTIFICATE OF SERVICE

It is hereby certified that service of the Defendant's Motion to Modify Bond as been made by U.S. Mail or electronic means on December 12, 2016 to the following:

Mr. Jonathan Baum
Assistant U.S. Attorney
1000 Louisiana, Suite 2300
Houston, Texas 77002

Ms. Virginia Finley
United States Pretrial Services Officer
P.O. Box 61127
Houston, Texas 77208

/s/ Richard Kuniansky
Richard Kuniansky

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vs.

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Defendant

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ORDER

Defendant Bomer's bond is modified to remove the curfew restriction from his conditions of release.

Signed this ____ day of December, 2016.

Honorable Vanessa D. Gilmore
United States District Judge